

**FILED**

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA**

JAN 29 2020

DORSEY J. REIRDON,

)

Plaintiff,

)

v.

)

CIMAREX ENERGY COMPANY  
and CIMAREX ENERGY CO. OF  
COLORADO,

)  
)  
)

Defendants.

)

PATRICK KEANEY  
Clerk, U.S. District Court

By \_\_\_\_\_  
Deputy Clerk

Case No. 6:16-cv-00445-SPS

**SUPPLEMENTAL DECLARATION OF JENNIFER M. KEOUGH ON BEHALF OF  
SETTLEMENT ADMINISTRATOR, JND LEGAL ADMINISTRATION LLC,  
REGARDING NOTICE MAILING AND ADMINISTRATION OF SETTLEMENT**

I, JENNIFER M. KEOUGH, declare as follows:

1. I am the Chief Executive Officer of JND Legal Administration LLC (“JND”). This Supplemental Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees, and if called upon to do so, I could and would testify competently thereto.

2. On December 20, 2019, I executed my Declaration of Jennifer M. Keough on Behalf of Settlement Administrator, JND Legal Administration LLC, Regarding Notice Mailing and Administration of Settlement. I submit this Supplemental Declaration to update the Court regarding developments since that time.

**NOTICE MAILING**

3. As of the date of this Supplemental Declaration, JND had received 46 Notices returned as undeliverable. In response, JND has forwarded two Notices to a new address provided by the USPS and re-mailed an additional eleven Notices following research for alternative addresses. Of the Notices that were re-mailed or forwarded, one was returned as undeliverable.

**WEBSITE**

4. As of the date of this Supplemental Declaration, the settlement website had tracked 250 unique users who registered 932 page views. A single visitor to the website can register multiple views.

**TOLL-FREE NUMBER**

5. As of the date of this Supplemental Declaration, JND had received a total of 126 telephone calls and handled 68 live calls.

**REQUESTS FOR EXCLUSION**

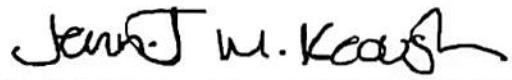
6. As of the date of this Supplemental Declaration, JND had received six requests for exclusion from the proposed Settlement. A list of the individuals and entities requesting exclusion is attached hereto as **Exhibit A**. According to the Initial Plan of Allocation schedule, the opt-outs represent approximately less than 0.039% of the Gross Settlement Fund.

**OBJECTIONS**

7. As of the date of this Supplemental Declaration, JND had received no objections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 28, 2020, at Seattle, Washington.

By:   
\_\_\_\_\_  
Jennifer M. Keough

---

# Exhibit A



*Dorsey J. Reirdon v. Cimarex Energy Company, et al.*

Case No. 6:16-cv-00445-SPS

Requests for Exclusion Received

| ID     | Name                       | Date Received |
|--------|----------------------------|---------------|
| 913682 | MERIT HUGOTON LP           | 1/7/2020      |
| 908731 | BEVERLY M ABRAM OAKES      | 1/13/2020     |
| 908732 | RODERIC W ABRAM            | 1/14/2020     |
| 911025 | KATHLEEN A BIRMINGHAM      | 1/6/2020      |
| 918748 | BESSIE HOLLMAN             | 1/16/2020     |
| 919629 | WILLIAM J & BESSIE HOLLMAN | 1/16/2020     |